

LETTER OF COMPLIANCE

Product TYPE:
Requesting Company Name:
CONTACT PERSON:
Date Issued:
All Platinum Packaging films are produced for the requested physical properties of our customers and formulated for those intended purposes.
These statements do not cover: any modification of our product by any addition of any other product to it; any prejudicial modification of our product resulting from a processing of the product; or an inadequate use and/or storage of our material or the finished articles by the end user.
Consequently, this letter certifies that the above film types are produced by Platinum Packaging, a division of IBFC and complies with all Regulation requirements identified in this Letter of Compliance.
Platinum Packaging films should be placed in the processing area 24 hours prior to processing to acclimatize. Platinum Packaging films are largely unaffected by climatic conditions but should not be stored at temperatures above 100 deg F (38 deg C) and less than 32 deg F (0 deg C). Under suitable storage conditions the film can be stored for a period of six months without any risk of deterioration
I hope that this information is sufficient.
Yours truly,

tel: (562) 630-6700 fax: (562) 630-6716

Regulation	Requirement	Compliance
Federal Food, Drug, and Cosmetic Act	9 CFR 317.24 Packaging materials. 9 CFR 317 24.(b) Packaging materials entering the official establishment must be accompanied or covered by a guaranty, or statement of assurance, from the packaging supplier under whose brand name and firm name the material is marketed to the official establishment. The guaranty shall state that the material's intended use complies with the FFDCA and all applicable food additive regulations. The guaranty must identify the material, e.g., by the distinguishing brand name or code designation appearing on the packaging material shipping container; must specify the applicable conditions of use, including temperature limits and any other pertinent limits specified under the FFDCA and food additive regulations; and must be signed by an authorized official of the supplying firm. The guaranty may be limited to a specific shipment of an article, in which case it may be part of or attached to the invoice covering such shipment, or it may be general and continuing, in which case, in its application to any article or other shipment of an article, it shall be considered to have been given at the date such article was shipped by the person who gives the guaranty. Guaranties consistent with the Food and Drug Administration's regulations regarding such guaranties (21 CFR 7.12 and 7.13) will be acceptable. The management of the establishment must maintain a file containing guaranties for all food contact packaging materials in the establishment. The file shall be made available to Program inspectors or other Department officials upon request. While in the official establishment, the identity of all packaging materials must be traceable to the applicable guaranty.	YES

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FDA and European Union

Platinum Packaging does not analyze for substances not purposely added but we have reviewed the status of Platinum Packaging film products in relation to the chemicals identified in the following FDA and EU DIRECTIVES. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in Platinum Packaging film products. We do exercise good product stewardship and seek information concerning additive composition from our suppliers. Based on this information, and knowledge of our process, we believe that these products do not contain the regulated substances.

- 21 CFR 177.1520 (c) (1.1) and (3.1): This regulation describes polypropylene and olefin copolymers that can be safely used in articles used for packaging or holding food at low temperatures and/or room temperatures.
- 21 CFR 178.2010: This regulation lists antioxidants and/or stabilizers for polymers which may be safely used for the manufacture of articles which come into direct contact with food.
- 21 CFR 178.3130: This regulation lists antistatic and/or antifogging agents, which may be safely used for the manufacture of articles, which come into direct contact with food.
- 21 CFR 176.170: This regulation has two tables for Raw and Processed Foods and Condition of use for Food Contact Substances. Providing that the metal surface of the metallized films are used as the inner sealable web in regular adhesive and/or polyextrusion laminated structures for snacks, chocolate, confectionery and other food products where barrier requirements are critical would meet this regulation.

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FDA and European Union continued	European Union Directives: 82/711/CEE - 93/8/CEE - 1935/2004/EC - 1895/2005/CE - 2002/72/CE ANNEXES I, II AND III and modifications included in 2004/19/EC - 2005/79/EC - 2007/19/EC - 2008/39/EC 2023/2006 EC - 94/62/EC - 85/572/EEC - 97/48EC, Germany: BgVV Recommendation VII- D.M. 21/3/73 and updating of 28/3/03 - D.M. 26/4/93 n° 220 - D.M. 15/6/00 n° 210	YES
REACH (EU # 1907/2006)	Platinum Packaging does not analyze for substances not purposely added but we have reviewed the status of Platinum Packaging film products in relation to the chemicals identified REACH regulations SVHC list. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in Platinum Packaging film products. We do exercise good product stewardship and seek information concerning additive composition from our suppliers. Information from the suppliers of additives used in our film products indicates that these substances are not intentionally added to their products. Please be advised Platinum Packaging does not use the ingredients identified on that list in the formulation or in the process to manufacture Platinum Packaging film products you purchase. Based on this information, and knowledge of our process, we believe that these products do not contain the regulated substances.	YES
Migratory Microwave Application	The U.S. Food and Drug Administration (FDA) has not issued any specific regulations on food packaging for microwave use. However, any package used in a food contact applications must be suitable for the intended use under FDA's good manufacturing practices (GMP) regulation found in Title 21 of the Code of Federal Regulations (CFR), Section 174.5 ("General provisions applicable to indirect food additives"). The context of cooking/reheat and temperature of extraction with different food stimulants is covered by CFR 176.170 and usage of polypropylene film is covered by CFR 177.1520.	YES

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	Platinum Packaging material complies with FDA 21 CFR 177.1520(c) (1.1) (c) 3.1a & (c) 3.2a including food cooking applications under conditions of use B, C, D, E and H described in Table 2 of 21 CFR 176.170 (c) and can be used with all food types listed in Table 1 of 21 CFR 176.170. If the film is in contact with fatty based foods it is possible to have superheating giving temperatures that can be above the melting point of the polypropylene film and non-compliance through breakdown (see 174.5).	
CEPA List of Challenge Substances Batch Numbers 1,2,3,4,5, 6,7,8, 9, 10, 11 and 12 Cobalt-containing substances Aromatic Azo-and Benzidine-Based substances Petroleum sector stream substances Domestic Substances List Inventory Update (DSL IU)	Platinum Packaging does not analyze for substances not purposely added but we have reviewed the status of Platinum Packaging film products in relation to the chemicals identified in the Canadian CEPA List. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in Platinum Packaging film products. We do exercise good product stewardship and seek information concerning additive composition from our suppliers. Information from the suppliers of additives used in our film products indicates that these substances are not intentionally added to their products. Please be advised Platinum Packaging does not use the ingredients identified on that list in the formulation or in the process to manufacture Platinum Packaging film products you purchase. Based on this information, and knowledge of our process, we believe that these products do not contain the regulated substances.	YES

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Azodicarbonamide	Azodicarbonamide, or azobisformamide, is an organic chemical, $C_2H_4O_2N_4$. It is a yellow to orange red, odorless, crystalline powder. It is known as Enumber E927. The principal use of Azodicarbonamide is in the production of foamed plastics. The thermal decomposition of azodicarbonamide results in the evolution of nitrogen, carbon monoxide, carbon dioxide, and ammonia gases which are trapped in the polymer as bubbles to form a foamed article. Common examples of this application are window and door gaskets, padded floor mats, gym/exercise mats, shoe soles etc	YES
European Commission Directives	Platinum Packaging herewith certifies that all polypropylene non-printed/non-coated films produced in the Morristown, TN and Lanoraie, QC facilities meet the requirements set forth in Directive 889/109/EC (1989), 90/128/EC (1990), 92/39/EC (1992), 93/9/EC (1993), 95/30EC (1995), 96/11/EC (1996), 1999/91/EC, EU 10/2011, EU and ED2009/251/EC Note:RoHS2011/65/EU will replace the current 2002/95/EC From the 1st of May 2011 until 31st of December 2012: the old testing regime applies. However the new testing regimes can be used by industry if convenient. From 1st of January 2013 until 31st of December 2015: the supporting document can be based on one of the two testing regimes, old and new ones. After 1st of January 2016: Only new testing regime is applicable.	
2-Nitropropane	Nitropropane is used principally as a solvent and chemical intermediate. As a solvent, it is used in inks, paints, adhesives, varnishes, polymers, and synthetic materials. It is a feedstock for the manufacture of 2-nitro-2-methyl-1-propanol and 2-amino-2-methyl-1-propanol (IARC 1982a). 2-Nitropropane is also used as a component of explosives and propellants, and in fuels for internal combustion engines (IARC 1999). This solvent is not used in the manufacture of Platinum Packaging Films.	YES

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Bovine Spongiform Encephalopathy	9 CFR 94.18: This regulation describes restrictions on importation of Meat and Edible Products from ruminants due to Bovine Spongiform Encephalopathy. Bovine spongiform encephalopathy (BSE), commonly known as mad-cow disease (MCD), is a fatal, neurodegenerative disease in cattle, that causes a spongy degeneration in the brain and spinal cord. BSE has a long incubation period, about 4 years, usually affecting adult cattle at a peak age onset of four to five years, all breeds being equally susceptible. In the United Kingdom, the country worst affected, more than 179,000 cattle have been infected and 4.4 million slaughtered during the eradication program.	YES
RUPP -21CFR 589.2000	Restricted Use Protein Products- (a) Definitions—(1) Protein derived from mammalian tissues means any protein containing portion of mammalian animals, excluding: Blood and blood products; gelatin; inspected meat products which have been cooked and offered for human food and further heat processed for feed (such as plate waste and used cellulosic food casings); milk products (milk and milk proteins); and any product whose only mammalian protein consists entirely of porcine or equine protein.	YES
PROP 65 Chemicals	Cancer causing or reproductive toxicity chemicals listed on the California Proposition 65 (The Safe Drinking Water and Toxic Enforcement Act of 1986)	YES
Melamine Formaldehyde	Melamine is widely used in plastics, adhesives, countertops, dishware, whiteboards. Melamine is combined with formaldehyde to produce melamine resin, a very durable thermosetting plastic No melamine or formaldehyde is contained in the films produced by Platinum Packaging.	YES
CONEG (Heavy Metals)	Total content of Cadmium, Chromium, Lead, and Mercury must be below 100ppm	YES

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ALLERGENS	All and any polypropylene packaging film products produced contain none of the below mentioned components nor are they based or derived from any known or potential food allergen such as, but not limited to: Peanuts Tree nuts	YES
	 Sesame/poppy/caraway seeds Eggs or egg derivatives Dairy or dairy derivatives Corn or corn derivatives Cottonseed products Soy or soy derivatives Gluten from rye, oats, wheat and barley FD&C/synthetic colors Sulfites Shellfish/fish Crustacean Monosodium glutamate (MSG) or MSG derivatives Celery Aspartame 	
BENZYL PHENOL	No benzyl phenol is contained in the films produced by Platinum Packaging. Renzyl phenol is crystalling substance with a malting point of	YES
	Benzyl phenol is crystalline substance with a melting point of 20.2-20.9°C, or a liquid; used as a germicide, preservative, and antiseptic.	
Styrene	No styrene is contained in the films produced by Platinum Packaging.	YES
Acrylamide Content	Platinum Packaging does not use the ingredients identified as Acrylamide in the formulation or in the process to manufacture Platinum Packaging products you purchase. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in any products that are manufactured by Platinum Packaging.	YES

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RoHS Directive	The substances banned under RoHS, lead (Pb), mercury (Hg), cadmium (Cd), hexavalent chromium (CrVI), polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE) are not intentionally added in the manufacture of or formulation of Platinum Packaging Films.	YES
Phthalate Content nonylphenol ethoxylates (NPEOs) octylphenol ethoxylates (OPEOs	The phthalates listed in article 1 of Decision 1999/815/EC are not intentionally added in the manufacture of or the formulation of this product. The phthalates are di-iso-nonyl phthalate(DINP), di-(2-ethylhexyl)phthalate (DEHP), di-n-butyl phthalate(DBP), di-iso-decyl phthalate(DIDP), di-noctyl phthalate(DNOP) and butylbenzyl phthalate(BBP). Phthalates are used primarily as plasticizers to add flexibility to plastics. The potential exposure to Di-n-Hexyl Phthalate (DnHP) has been known to cause adverse reproductive or	YES
Alkylphenol ethoxylate BBP	developmental effects in people. Nonylphenol ethoxylates (NPEOs) and octylphenol ethoxylates (OPEOs) are not used in the manufacture of Platinum Packaging films.	
Bisphenol A (BPA) Bisphenol A Diglycidyl Ether (BADGE) Bisphenol F Diglycidyl Ether	No Bisphenol A, Bisphenol A Diglycidyl Ether, Bisphenol F, and Diglycidyl Ether is contained in the films produced by Platinum Packaging. These are industrial chemicals used to make polycarbonate plastic resins, epoxy resins, and other products.	YES
(BFDGE) Flame retardants PFC's	No perfluorinated chemicals (PFC's) fluorotelomers, or brominated flame retardants are contained in the films produced by Platinum Packaging which include but not limited to the following chemicals:	YES
Fluorotelomers	Perflurobutanoic Acid (PFBA) Cas # 375-22-4 Perfluroctane Sulfonate Acid (PFOS) Cas # 1763-23-1 Perfluroctanoic Acid (PFOA) Cas # 335-67-1 Polybrominated biphenyls (PBBs) Polybrominated Diphenyl Ethers (PBDE) Cas # 60371-14-4	

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Novolac Glycidyl Ethers (NOGE)	Novolac is the technical name for complex mixtures obtained by reaction of phenol with formaldehyde under acidic conditions. When Novolac is reacted with epichlorohydrin, HCl is eliminated forming Novolac glycidyl ethers (NOGE). An important difference between NOGE and BADGE is the number of reaction products that are formed during the reaction between phenol and acetone or formaldehyde. Acetone reacts with phenol only at the para-position forming bisphenol-A, a single compound that is the precursor to BADGE. However, formaldehyde can react with phenol at the para and the two ortho sites creating three bisphenol-F isomers, the precursors to NOGE. Besides the three possible 2-ring bisphenol-F isomers, up to three phenols can be bonded to each phenol enabling oligomerization through the methylene groups. The result is that NOGE is a complex mixture of 2-, 3-, 4-, 5- and 6-ringed compounds with various mean molecular weights.	YES
Ozone Depletion Substance	Platinum Packaging hereby certifies that its BOPP plants do not intentionally use any of the ozone depleting substances listed under Class I and Class II of the 1990 Clean Air Act to manufacture any of our polyolefin films. The films, therefore, do not require labeling as set out in the rule of the Federal Register (57 FR 19166) of the 4th of May 1992. This certificate relates only to non-printed/non-coated polypropylene packaging films.	YES
NATURAL RUBBER LATEX	No Genetically Modified materials or Natural Rubber Latex.	YES
Chlorine Bleach	Use of Chorine bleach in clean up process or in product zones is not allowed.	YES
KOSHER Certified	Platinum Packaging is a plastic film manufacturing facility that has no type of foods or food type materials within the process or operation. To be certified by a Rabbi of the Jewish Faith is not considered applicable for this type of facility.	NO

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Vinyl Acetate Vinyl Chloride Epoxidised Soy Bean Oil (ESBO) PVC	No Vinyl Acetate, Vinyl Chloride, ESBO or PVC is contained in the films produced by Platinum Packaging.	YES
Antimicrobial additives	Microbes that contaminate packaging materials typically are controlled by using heat, steam, or radiation, or by the addition of antimicrobial additives. Packaging microbials are materials that can be added to packaging materials and will prevent microbial growth. Nor does it use or treated with fungicides, preservatives, or fumigants	Platinum Packaging does not utilize the use of Antimicrobial Additives in films.
Lead Content (lead in surface Coatings and or in Substrates Materials)	No Lead is contained in the films produced by Platinum Packaging.	YES
3- Monochloropropane - 1,2- diol (3-MCDP) CAS NO. 96-24-2.	No 3-Monochloropropane – 1,2- diol is contained in the films produced by Platinum Packaging.	YES
Dimethylfumarate (DMF)	No Dimethylfumarate is contained in the films produced by Platinum Packaging.	YES
Methylnaphthalene	No methylnaphthalene is contained in the films produced by Platinum Packaging.	YES
Alpha Methyl Styrene (CAS# 98-83-9)	No Alpha Methyl Styrene is contained in the films produced by Platinum Packaging.	YES

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Recyclables	BOPP film products are recyclable as per Industry standards and procedures. Recyclable film by original manufacturing. Some limitations may exist from conversion and or laminations depending on conversion type that shall be stated by convertor. This exempts and removes Platinum Packaging from liabilities when film is used with other products.	YES
Recycled Content	Our films contain up to 25% internal recycled polypropylene. This recycled material originates from trim and transitional production and is reground and extruded into pellets. This recycled material is 100% internal recycle made from FDA food contact approved raw materials. It is not chemically modified in any way in the recycling process.	YES
	There is no post-consumer recycle materials utilized in our film manufacturing process.	
HDODA 1,6 Hexanediol diacrylate	We do not use HDODA in our formulation or the process to manufacture Platinum Packaging film. We do not analyze for ingredients not purposely added but based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in the film.	YES
Australian Standard A2070-1999	Australian Standard A2070-1999, Plastics materials for food contact use, Section 4 "General Requirements for New Plastics Materials and Rework Materials" (Mar. 5, 1999, rec'd Oct. 17, 2000). "New plastics materials used in the manufacture of plastics items for food contact use shall comply with the following: (a) The relevant regulations in the United States of America Food and Drugs Administration as set out in the Code of Federal Regulations 21 C.F.R. Parts 170 to 199 and any subsequent amendments and revisions; (b) the relevant European Commission directives for materials and articles intended to come into contact with foodstuffs as set out by Commission Directives 89/109/EEC (Framework Directive) and 2002/72/EEC (Plastics Directive)."	YES

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ITX Isopropylthioxantho ne	No ITX Isopropylthioxanthone is contained in the films produced by Platinum Packaging.	YES
Benzophenone CASRN 119-61-9 4- methylbenzophenon e CASRN 134-84-9	No benzophenone compounds are contained in the films produced by Platinum Packaging.	YES
2- HYDROXYBENZOPH ENONE CASRN 117- 99-7		
Asbestos	No asbestos is contained in the films produced at Platinum Packaging.	YES
BHT, BHA, TBHQ Stearates, Starches	No food additives or preservatives are contained in the films produced at Platinum Packaging.	YES
Pesticides and Fungicides	No pesticides or fungicides are contained in the films produced at Platinum Packaging.	YES
Dioxins	No dioxins are contained in the films produced at Platinum Packaging. Dioxins are found throughout the world in the environment and they accumulate in the food chain, mainly in the fatty tissue of animals.	YES

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MDI/MDA Plasticizers Substituted Diphenylamines	No MDI or MDA plasticizers are contained in the films produced at Platinum Packaging which include which include but not limited to the following chemicals: Benzene, 1,1'-methylenebis[4-isocyanato-, CAS RN 101-68-8 Benzenamine, 4,4'-methylenebis-, CAS RN 101-77-9 Benzene, 1,1'-methylenebis[2-isocyanato-, CAS RN 5/2/2536 2536-05-2 Benzene, 1-isocyanato-2-[(4-isocyanatophenyl)methyl]-, CAS RN 5873-54-1 Isocyanic acid, polymethylenepolyphenylene ester, CAS RN 9016-87-9 Benzene, 1,1'-methylenebis[isocyanato-, CAS RN 26447-40-5 No substituted diphenylamines are contained in the films produced at Platinum Packaging which include but not limited to the following chemicals: Benzenamine, 4-octyl-N-(4-octylphenyl)-, CAS RN 101-67-7 Benzenamine, 4-(1-methyl-1-phenylethyl)-N-[4-(1-methyl-1-phenylethyl)phenyl]-, CAS RN 10081-67-1 3. Benzenamine, ar-octyl-N-(octylphenyl)-, CAS RN 26603-23-6 Benzenamine, N-phenyl-, reaction products with 2,4,4-trimethylpentene, CAS RN 68411-46-1 Benzenamine, N-phenyl-, styrenated, CAS RN 68442-68-2	YES
Jatropha Plant	Platinum Packaging does not use any ingredients derived from the Jatropha plant in the formulation or in the process to manufacture Platinum Packaging products. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in any products that are manufactured by Platinum Packaging.	YES
Model Toxics in Packaging Legislation (1998 revision)	Platinum Packaging does not analyze for substances not purposely added but we have reviewed the status of Platinum Packaging film products in relation to the substances outlined in the list. Based on the raw material certifications and the fact that those ingredients are not intentionally added, they are not expected to be found in Platinum Packaging film products.	YES

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TNPP	Platinum Packaging does not intentionally add the chemical TNPP (Trisnonylphenylphosphite) to our products. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added, they are not expected to be found in Platinum Packaging film products.	YES
Perchlorate and long-chain Perfluorocarboxylat es	Platinum Packaging does not intentionally add the chemical Perchlorate and long- chain perfluorocarboxylates (PFCs) to our products Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in Platinum Packaging film products.	YES
Dodd Frank Wall Street Reform and Consumer Protection Act- Section 1502	Platinum Packaging does not analyze for substances not purposely added and we have reviewed the status of Platinum Packaging film products in relation to the Dodd-Frank Act section 1502. Based on our knowledge of the raw materials and the fact that these minerals are not intentionally added, they are not expected to be found in Platinum Packaging film products. We do exercise good product stewardship and seek information concerning additive composition from our suppliers. Based on this information, and knowledge of our process, we believe that our products do not contain conflict minerals	YES

Substance List:

Substance, Identifying Code application	CAS#
PP	9003-07-0

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